

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW HAMPSHIRE

United States of America, )  
                                )  
Plaintiff,                 )  
                                )  
v.                            ) Civil No.  
                                )  
One Sig Sauer Sig M400, 556 Caliber Rifle,      ) JURY TRIAL REQUESTED  
Serial no. 20J011537, seized from Cowin Hillsgrave,    )  
                                )  
Defendant *in rem*.            )  
                                )

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**VERIFIED COMPLAINT FOR FORFEITURE *IN REM*,  
FOR PROPERTY WITHIN THE UNITED STATES' POSSESSION, CUSTODY  
OR CONTROL PURSUANT TO SUPPLEMENTAL RULE G**

Plaintiff, United States of America, brings this complaint in accordance with Supplemental Rule G(2) of the Supplemental Rules for Admiralty and Maritime Claims and Asset Forfeiture Actions, and alleges:

**NATURE OF THE ACTION**

This is an action to forfeit and condemn to the use and benefit of the United States of America the following property: one Sig Sauer Sig M400, 556 caliber rifle, Serial no. 20J011537, seized from Cowin Hillsgrave, pursuant to 21 U.S.C. § 881(a)(11).

**JURISDICTION AND VENUE**

Plaintiff brings this action *in rem* in its own right to forfeit and condemn the defendant *in rem* firearm under 21 U.S.C. § 881. This Court has jurisdiction over this action under 28 U.S.C. §§ 1335, 1395. Venue is proper in this district pursuant to 28 U.S.C. §§ 1335, 1395.

**THE DEFENDANT *IN REM***

The defendant *in rem* is One Sig Sauer Sig M400, 556 caliber rifle, Serial no. 20J011537, seized from Cowin Hillsgrave. The United States Drug Enforcement Administration (DEA) has

custody of the defendant *in rem*.

### FACTS

1. In 2019, law enforcement officers identified Cowin Hillsgrave (Hillsgrave) as a large-scale methamphetamine dealer in the Concord, New Hampshire area. On February 8, 2018, officers executed a state search warrant at the room Hillsgrave rented at the Residence Inn on Hall Street in Concord. During the search, officers seized about 21 grams of lab confirmed methamphetamine, two loaded handguns, a handwritten purchase and sales agreement for another firearm, a receipt for two firearm magazines, half a suspected amphetamine and dextroamphetamine pill, \$267 in U.S. currency, three digital scales, plastic bags, two smart phones, a handwritten notebook believed to be a drug ledger, and drug paraphernalia.

2. On June 13, 2019, officers executed a state search warrant for Hillsgrave's residence at 18 Main Street in New Durham, New Hampshire. Officers seized a small quantity of methamphetamine, a notebook filled with names and phone numbers, a scale, drug paraphernalia, a rifle magazine, ammunition, a stun gun, and the defendant *in rem*. The defendant *in rem* was hanging near the front door and was loaded with a round in the chamber.



3. Hillsgrave was indicted and pleaded guilty to possession with intent to distribute a controlled substance (methamphetamine) and possession of a firearm in furtherance of a drug trafficking crime. He agreed to the administrative or civil forfeiture of the defendant *in rem*. Hillsgrave admitted the defendant *in rem* firearm was used to facilitate or was derived from

proceeds of the drug crime. Plea Agreement ¶ 12, *United States. v. Cowin Hillsgrave*, No. 1:19-cr-00226-PB, U.S.D.C., D.N.H.

**CLAIM FOR FORFEITURE**  
21 U.S.C. § 881(a)(11)

4. The allegations contained in paragraphs 1 through 6 of this Verified Complaint for Forfeiture in Rem are incorporated by reference.

5. Title 21, United States Code, Section 881(a)(11) provides that "any firearm... used or intended to be used to facilitate the transportation, sale, receipt, possession, or concealment of..." controlled substances or proceeds traceable to controlled substances, shall be forfeited to the United States.

6. The defendant *in rem* is a firearm that was used or intended to be used to facilitate the transportation, sale, receipt, possession, or concealment of controlled substances, or proceeds traceable to controlled substances.

7. As a result, the defendant *in rem* firearm is liable to condemnation and forfeiture to the United States for its use, in accordance with 21 U.S.C. § 881(a)(11).

**PRAYERS FOR RELIEF**

Therefore, the United States requests that:

- (a) the Clerk of Court issue a Warrant of Arrest in Rem in the form submitted with this Verified Complaint to the United States Marshal for the District of New Hampshire, commanding him to arrest the defendant *in rem*;
- (b) this matter be scheduled for a jury trial;
- (c) judgment of forfeiture be entered; and
- (d) this Court grant the United States its costs and whatever other relief to which it may be entitled.

Respectfully Submitted,

JANE E. YOUNG  
United States Attorney

Dated: April 26, 2024

By: /s/ Robert J. Rabuck  
Robert J. Rabuck  
NH Bar # 2087  
Chief, Civil Division  
Assistant U.S. Attorney  
53 Pleasant Street  
Concord, New Hampshire  
603-225-1552  
[Rob.Rabuck@usdoj.gov](mailto:Rob.Rabuck@usdoj.gov)

**VERIFICATION**

I, John F. Corridan, being duly sworn, depose and say that I am a Task Force Officer assigned to the Drug Enforcement Administration, and as such have responsibility for the within action, that I have read the contents of the foregoing Verified Complaint for Forfeiture in Rem and know the contents therein, and that the same is true to the best of my knowledge, information and belief.

The sources of my information and the grounds of my belief are official records and files of the United States and the State of New Hampshire, and information obtained by me and other law enforcement officers during an investigation of alleged violations of the controlled substance laws of the State of New Hampshire and of the United States.

/s/ John F. Corridan  
John F. Corridan

STATE OF NEW HAMPSHIRE  
COUNTY OF MERRIMACK

Subscribed and sworn to before me this 26th day of April 2024.

/s/ Joan E. Hederman  
Notary Public

My commission expires on April 8, 2025.